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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF DEAN HEYL IN
RESPONSE TO THE COURT'S September
12, 2025, ORDER**

1 I, Dean Heyl, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am the Chief Human Capital Officer of the U.S. Department of Labor
3 (“Department”), headquartered in Washington, D.C. I have served in this position since July 29,
4 2025.

5 2. In my role at the Department, I am responsible for personnel management. I have
6 the responsibility for overseeing the human resources enterprise and tracking and recording of
7 personnel actions, including terminations. I assist in ensuring that all personnel actions comply
8 with Federal law, including those related to probationary employees.

9 3. I acknowledge having received and reviewed the Court’s September 12, 2025,
10 Order.

11 4. I confirm that, as of October 30, 2025, the Department sent corrective notices in
12 accordance with Paragraph 5 of the Court’s September 12, 2025, Order to all applicable
13 employees, of which there were one-hundred sixty-eight (68) individuals. An exemplar of the
14 corrective notices is attached.

15 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
16 and correct.

17 Dated: November 13, 2025

18
19
20 /s/ *Dean A. Heyl*

21 _____
22 DEAN HEYL
23 CHIEF HUMAN CAPITAL OFFICER
24 U.S. DEPARTMENT OF LABOR
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From: [Career Transition Services](#)
To: [REDACTED]
Cc: [Career Transition Services](#)
Subject: Corrective Notice For [REDACTED]
Date: Thursday, October 30, 2025 11:06:00 AM
Attachments: [Corrective Notice for \[REDACTED\].pdf](#)

Dear [REDACTED],

Please see attached corrective notice.

U.S. DEPARTMENT OF LABOR

WASHINGTON, DC 20210

October 29, 2025

[REDACTED]

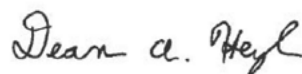
Dear [REDACTED]:

This corrective notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in the case *American Federation of Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.).

As required by Paragraph 5 of the district court's order, the U.S. Department of Labor (DOL) informs you that you did not receive a notice of termination on the basis of your personal performance.

As required by Paragraph 3 of that order, DOL has confirmed that your personnel file, including your SF-50s, does not reflect that you were terminated for performance or conduct.

Sincerely,



DEAN HEYL

Assistant Secretary for Administration and
Management (OASAM)